IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,	:	
Plaintiff,	:	CASE NO. 2:22-CR-19-002
v.	:	JUDGE JAMES L. GRAHAM
JONATHAN A. FROST,	:	
Defendant.	:	

MOTION FOR TRAVEL AUTHORIZATION

Defendant Jonathan A. Frost, through undersigned counsel, respectfully moves the Court

for an Order authorizing his travel to Macon, Georgia. The reasons in support of this Motion are

set forth in the following Memorandum.

Respectfully submitted,

/s/ Samuel H. Shamansky
SAMUEL H. SHAMANSKY CO., L.P.A.
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Counsel for Defendant

MEMORANDUM

Defendant seeks to attend a memorial for his grandmother who recently passed. The service is being held in Macon, Georgia. Mr. Frost intends to begin the drive to Georgia on Tuesday, March 28, 2023, and return to Katy, Texas by Saturday, April 1, 2023. He will, at all times, be accompanied by a parent.

This matter has been discussed with Assistant United States Attorney Jessica Knight, who is not opposed so long as Mr. Frost's travel is approved by pretrial services. Defendant has informed undersigned counsel that he contacted and received such permission from the probation office.

Accordingly, based on the foregoing, Mr. Frost respectfully requests that this motion be granted so he may attend his grandmother's funeral.

Respectfully submitted,

/s/ Samuel H. Shamansky
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Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was filed with the Clerk of Court for the Southern District of Ohio, which will send notification of such filing to Assistant United States Attorney Jessica Knight on March 10, 2023.

/s/ Samuel H. Shamansky
SAMUEL H. SHAMANSKY